

## REMARKS

1. Applicant will submit prior art in an Information Disclosure Statement which will be delivered separately.
2. Applicant notes the Examiner's comments with respect to the requirement of an Information Disclosure Statement for the Loom and other reference which are identified by web links. These materials do not represent prior art to the invention, but are technologies which are utilized to implement one embodiment of the present invention.
3. Enclosed find a substitute drawing for Figure 2.
4. Enclosed find a substitute drawing for Figures 1 and 3, which are marked "Prior Art."
5. Enclosed find a redlined and clean copy of a Substitute Specification which addresses the Examiner's concern about web links in the specification.
6. Applicant notes the Examiner's objection to the reference at page 6, lines 21-29 to third party licensing of what the Examiner characterizes as "essential matter." As stated in the Specification, the University of Southern California makes the LOOM Program available at no cost for non-commercial uses. In that respect, the LOOM Program is no different than any other readily available computer program, such as Microsoft Word, Microsoft Excel, or Microsoft PowerPoint. LOOM is simply a tool or environment within which the ontology is developed. At the time of the filing of the application, this was the tool or environment which was utilized to implement the invention. The reference to LOOM is essentially no different than a reference to a programming language, such as "Fortran" or "Visual Basic," or to any conventional program which is readily available such as "Microsoft Word" or "Mathematica." Accordingly, Applicant does not believe that it should be required

to remove the reference to the source of the LOOM program.

7. In paragraph no. 9, the Examiner contends that the Specification is objected to because it relies upon the incorporation of essential material by reference to publications. Applicant has corrected the Specification to remove the embedded links. No new material is being added to the Specification. Accordingly, no declaration would be appropriate.

8. In paragraph no. 10, the Examiner objects to the Specification stating that its attempt to incorporate subject matter by reference to "LOOM, Ontosaurus, CL-HTTP Forum MIT and Description Logics" is improper. As stated above, these tools are readily available to anyone practicing in this field. Accordingly, it is more correct to view these programming resources as not the invention, but the tools, language or environment of the invention. As discussed above, the analogy would be to a program which is written in Fortran which includes an inventive concept. The patent applicant would not be required to provide a complete description of the Fortran language, and it would be presumed that those having skill in Fortran programming would have the basic tools and knowledge necessary in order to understand the invention which would be contained within the code, not the particular language. Accordingly, Applicant traverses the Examiner's contention that one of ordinary skill would not have in their possession these tools.

9. In paragraph no. 11, the Examiner rejects Claims 1-9 through under 35 USC Section 112, first paragraph, as failing to comply with the enablement requirement. Applicant traverse this conclusion. The LOOM Program is very well documented. Furthermore, the LOOM Program is merely one type of tool or environment which can be utilized to implement the present invention. Attached find three print-outs from Amazon.com for books which reference these types of systems, including the LOOM Program.

10. Applicant traverses the Examiner's rejection because the LOOM Program is

merely a tool or environment in which the present invention is implemented. This tool or environment is generally available free of charge. It is a recognized system from a plurality of alternative environments which may be utilized to implement the present invention.

11. Applicant has cancelled Claim 3.

12. With respect to issues raised regarding the Declaration, the inventor's name is "Flett" not "Fleet." The application as filed, the oath/declaration, and the assignment all identify him CORRECTLY as "Flett." Accordingly, no substitute declaration is needed. Mr. Curry, Mr. Meany, and Mr. Perry are not co-inventions in the present application (they are employees of the Applicant).

13. With respect to the rejection under 35 USC Section 102(a), the cited prior art "Better Knowledge Management Through Knowledge Engineering" was presented at ES2000, British Computer Society's 20<sup>th</sup> Annual International Conference on Knowledge Based Systems and Applied Artificial Intelligence, Cambridge in December 2000. This was then reprinted in IEEE Intelligent Systems, Jan-Feb 2001, pages 36-43. The patent submission was made in June 2000, so the submission predates the reference.

Please charge Deposit Account No. 02-0429 in the amount of \$980.00 for the extension fee. No additional fee is believed to be required; however, in the event additional fees are required, please charge Deposit Account No. 02-0429.

Respectfully submitted,

A handwritten signature in black ink that reads "Mel A Hunn". The signature is written in a cursive, flowing style.

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